

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

IN RE WORLD TRADE CENTER  
LOWER MANHATTAN DISASTER  
SITE LITIGATION

---

21 MC 102 (AKH)

ROSA DIEZ (and husband, PANCRÌ DIEZ),

07-CV-5352 (AKH)

Plaintiffs,

-against-

**NOTICE OF ADOPTION BY  
CENTURY 21, INC. OF  
ANSWER TO MASTER  
COMPLAINT**

80 LAFAYETTE ASSOCIATES LLC, ET AL.,

Defendants.

---

**PLEASE TAKE NOTICE** that defendant **CENTURY 21, INC.** (hereinafter "Century 21"), as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, herein adopt Century 21's Answer to Master Complaint, dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

**WHEREFORE**, Century 21 demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
September 10, 2007

**HARRIS BEACH PLLC**  
*Attorneys for Defendant*  
CENTURY 21, INC.

/s/

---

Stanley Goos, Esq. (SG 7062)  
100 Wall Street, 23<sup>rd</sup> Floor  
New York, New York 10005  
(212) 687-0100

TO:

Paul Napoli, Esq.  
Worby Groner Edelman & Napoli Bern LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006

Robert A. Gochow, Esq.  
Robert A. Gochow, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

Gregory J. Cannata, Esq.  
Law Offices of Gregory J. Cannata  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

***Liaison Counsel for Plaintiff***

James E. Tyrrell, Esq.  
Joseph Hopkins, Esq.  
Patton Boggs LLP  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102

Thomas Egan, Esq.  
Flemming Zulack Williamson Zauderer LLP  
One Liberty Plaza  
New York, New York 10006

***Liaison Counsel for the Defendants***

All Other Defense Counsel

**CERTIFICATION AS TO SERVICE**

The undersigned certifies that on September 11, 2007, I caused the following document to be electronically via the Court's ECF system:

1. Notice of Century 21's Adoption of Answer to Master Complaint.

The undersigned further certifies that on September 11, 2007, I caused the aforesaid documents to be served via First Class Mail upon the following:

Paul Napoli, Esq.  
Worby Groner Edelman & Napoli Bern LLP  
115 Broadway, 12<sup>th</sup> Floor  
New York, New York 10006

Robert A. Grochow, Esq.  
Robert A. Grochow, P.C.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

Gregory J. Cannata, Esq.  
Law Offices of Gregory J. Cannata  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279

James E. Tyrrell, Esq.  
Joseph Hopkins, Esq.  
Patton Boggs LLP  
One Riverfront Plaza, 6<sup>th</sup> Floor  
Newark, New Jersey 07102

Thomas Egan, Esq.  
Flemming Zulack Williamson Zauderer LLP  
One Liberty Plaza  
New York, New York 10006

***Liaison Counsel for the Defendants***

***Liaison Counsel for Plaintiffs***

Dated: September 11, 2007

*/s/*

\_\_\_\_\_  
Stanley Goos, Esq. (SG 7062)